

Richard A. Madsen, Jr. (SBN 146174)
MADSEN LAW FIRM
551 Hartz Avenue, Suite B
Danville, California 94526
Telephone: (925) 837-0900
Facsimile: (925) 837-0905
Email: Rick@MadsenLawFirm.com

**Attorney for Plaintiff,
Natalie Sramek**

UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF CALIFORNIA

Natalie Sramek,

Case No.: 15-cv-04873-HSG

Plaintiff,

VS.

**California Highway Patrol (“CHP”);
CHP Commissioner Joseph Farrow;
CHP Officer Sean Harrington;
CHP Officer Robert Hazelwood;
individually and in their official capacities
as peace officers; and DOES 1-100.**

**STIPULATED REQUEST TO
MOVE INITIAL CASE
MANAGEMENT CONFERENCE
AND EXTEND TIME FOR
SERVICE AND DEFENDANTS'
TIME TO ANSWER**

Defendants.

Pursuant to Civil Local Rule 6-2, the parties hereby submit their stipulated request to extend time for service and for Defendants' time to answer, and to move the initial Case Management Conference currently scheduled for January 26, 2016, at 2:00 p.m., for the following reasons:

1. This action is one of two cases filed in the above-captioned court, that involve all or a material part of the same subject matter and all, or substantially all, of the same parties as this action. This stipulated request is being simultaneously made in the other case as well (*Vogt vs. CHP, et al.* Case No. 15-cv-05199-JCS).

2. In both actions, Defendant, California Highway Patrol (by and through the Office of the Attorney General, State of California) received plaintiff's "Notice of a

1 Lawsuit and Request to Waive Service of Summons," along with the Complaint, and all
2 other required documents on December 14, 2015. Subsequently, the parties have
3 engaged in a good faith dialogue regarding several anticipated issues, including the
4 status and perfection of service of the Complaint on the individual defendants. The
5 stipulated requested extension will provide the parties additional time to ensure all
6 parties are properly served and represented for appearance in the action.

7 3. The parties have conferred and share an interest in an efficient and
8 economical approach to managing this litigation, and are evaluating with their clients
9 the possibility of engaging in early private mediation. To that end, the parties believe
10 that moving the initial Case Management Conference and extending Defendants' time to
11 appear and respond to the Complaint would prevent premature expenditure of resources
12 and allow the Parties to further organize, confer on, and evaluate the two pending
13 related actions filed in this District for efficient management.

14 4. Therefore, the parties stipulate and jointly request that new dates in this
15 matter be assigned and ordered as follows:

16 · Service of all Defendants on or before March 1, 2016
17 · Extend Defendants' time to answer to April 15, 2016
18 · Initial Case Management Conference on or about May 17, 2016 (with other
19 associated deadlines continued accordingly).

20 5. There have been no previous requests or orders for time modification in
21 the case. The requested extension of time will not appreciably delay proceedings in this
22 action, and will enable more efficient and economical management of the litigation. No
23 parties will be prejudiced, and all parties will remain similarly positioned to proceed
24 without further delay.

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1 **IT IS SO STIPULATED AND REQUESTED.**
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6 Dated: January 13, 2016
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8 By: /s/ Richard A. Madsen, Jr.
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10 Richard A. Madsen, Jr., Esq.
11 Attorney at Law
12 Madsen Law Firm
13 551 Hartz Avenue, Ste. B
14 Danville, CA 94526
15 Telephone: (925) 837-0900
16 Facsimile: (925) 837-0905
17 Email: Rick@MadsenLawFirm.com

18 Attorney for Plaintiff
19 Natalie Sramek
20

21 By: /s/ Wil Fong
22

23 Wil Fong, Esq.
24 Deputy Attorney General
25 Office of the Attorney General
26 1515 Clay Street, 20th Floor
27 Oakland, CA 94612-0550
28 Telephone: (510) 622-2114
Facsimile: (510) 622-2121
Email: Wil.Fong@doj.ca.gov

Attorney for Defendant
California Highway Patrol

16 **PURSUANT TO STIPULATION, IT IS SO ORDERED EXCEPT THAT THE**
17 **CASE MANAGEMENT CONFERENCE WILL BE HELD ON MAY 10, 2016.**
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19 Dated: January 14, 2016
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21 Honorable Haywood S. Gilliam, Jr.
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